



July 7, 2025

Michael Mills, Chair
Jerry Meninick, Vice Chair
Columbia River Gorge Commission
PO Box 730
1 Town & Country Square
57 NE Wauna Avenue
White Salmon, WA 98672

Subject: Oregon White Oak Woodlands: Additional Data Analysis

Dear Columbia River Gorge Commissioners,

I am writing to emphasize the need for additional data analysis in order to obtain a more complete and comprehensive understanding of Wasco County's oak landscape, particularly concerning potential future development and the hypothetical impacts of habitat. To inform future policy decisions aimed at protecting oak in the Columbia River Gorge National Scenic Area, it is essential that the data considered incorporates and combines several additional factors that may significantly deter or preclude development on lands currently mapped as oak habitat.

To accurately assess the true vulnerability of these habitats and guide effective conservation strategies, I urge the Commission to include the following in any future analyses:

1. **Slope Analysis:** Map the extent of Wasco County's oak habitat that lies within slopes exceeding 15% and, more specifically, 30% or greater. Residential and agricultural development on such steep slopes presents significant engineering and practical challenges, often rendering these areas unsuitable for future habitat removal.
2. **Development Buffer Zone Analysis:** Delineate how much of the county's oak habitat falls within the Columbia Gorge Management Plan's designated 75-foot, 100-foot, and 150-foot development buffer zones for streams, ponds, lakes, riparian areas, and wetlands. Development is typically restricted or highly limited within these sensitive ecological buffer areas.
3. **Landslide Hazard Analysis:** Integrate data from the Statewide Landslide Information Layer for Oregon to map the proportion of Wasco County's oak habitat located within designated landslide areas. Lands identified as landslide hazards, especially on steep slopes, are substantially less likely to be developed due to inherent risks.
4. **Flood Zone Analysis:** Incorporate data from FEMA-designated flood zones to identify how much of the county's oak habitat is situated within these areas. Development within mapped flood zones is often subject to strict regulations and may be significantly deterred or precluded.

5. **Existing Development Overlay:** Map the amount of oak habitat currently on lands already developed for residential or agricultural use. This analysis will provide crucial insights into past impacts and help project the true potential for future development that could affect remaining oak habitats.

By integrating these additional layers of data, the Commission can gain a more nuanced and realistic understanding of where oak habitat in Wasco County is truly vulnerable to development and where natural or regulatory constraints already offer a degree of protection. This comprehensive approach will enable the development of more effective and targeted policies for oak conservation within the Columbia River Gorge National Scenic Area.

Thank you for your time and consideration of this vital matter.

Sincerely,

Daniel Dougherty,
Wasco County Planning Division Director